

More comments

Gretchen Baker [c_g_baker@yahoo.com]

Sent:

Sunday, September 20, 2009 8:28 PM

To:

snakevalley@utah.gov; [Snake Valley](#)

Attachments:

 [Snake Valley Agreement com~1.doc \(28 KB\)](#) [Open as Web Page]

Thank you for considering the following comments, questions, and suggestions.

Sincerely,

Gretchen Baker

Comments on Agreement for Management of the Snake Valley Groundwater System

General comments

1. There is currently pumping in Nevada that has caused Needle Point Spring in Utah to stop flowing and in fact, the water table keep decreasing. Yet, nothing has been done to ameliorate this situation. If the states have problems figuring out such a small interstate problem, it does not lend confidence to the states agreeing on such a large pumping scheme as proposed by SNWA and the multitudes of different ways it could affect water rights in both Utah and Nevada.

2. For the biological monitoring, it appears that conservation targets will only be sensitive species. This is too small a scope. It is likely that many species live in the aquifer underlying Snake Valley and have yet to be discovered and described. The Edwards Aquifer has 40 species of subterranean creatures living in it (<http://www.edwardsaquifer.net/species.html>). While Snake Valley's aquifer probably doesn't have so many, this aquifer should be searched. Scientifically based, peer-reviewed methods exist, and Dr. Steven Taylor from the Illinois Natural History Survey would be one person capable of overseeing such a study. The creatures living in the Snake Valley aquifer would be some of the first ones that would be affected by groundwater pumping. An inventory of them is critical before the commencement of the large-scale groundwater pumping. Wells and springs can be surveyed for these creatures, along with the Gandy Warm Springs Cave and Lexington Cave, both of which are in

contact with the water table. A list of sensitive species should be developed after additional sensitive habitats are surveyed.

3. The extended comment period is appreciated, but it still seems that this process is being rushed. Additional time to review and comment on the agreement is requested.

Detailed comments

Section 1.1a regards a lowering of the water level in a well that differs from the “well’s historical production.” What time period does the “well’s historical production” encompass? If a well has a long history, is the well’s historical production averaged over this entire time period, or is more weight given to recent times, where lower water tables may paint a very different picture?

Section 1.1b regards a lowering of spring flow that differs from the “spring’s historical supply.” Most springs have scant or nonexistent discharge histories. Are more springs going to be targeted in order to develop this record of “historical supply?” How are seeps, which can be important for vegetation growth, to be treated, since spring flow at them is nearly impossible to measure? If different groups have different measurements, how will these be resolved?

Section 3.2 states that “Based on the best currently available data...” How will the states agree on a new afy number by future studies? I recommend inserting the clause right after data “scientifically based, third-party collected, peer-reviewed reports”

Section 4.5 regards data; Please use more specific language about who will create, maintain, and publicly share database and on what timeline.

Section 6.1 regards public notice. In South Snake Valley, we request that public notices be posted to the post office bulletin boards and be provided to community leaders to post on the Snake Valley listserve.

Section 6.3.a.9 “Climatic conditions, e.g. drought year” Who determines what constitutes a drought year?

Section 6.3.b.7 “Recent seismic activity” Who will be monitoring this?

Section 6 throughout. It appears that the burden of proof falls on the Senior Water Right Holders. Although the senior water right holders should notify SNWA and the states of concerns about water reductions, SNWA should assist in gathering data of what their pumping may be doing to these senior water rights.

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